

Michael Siderius  
SIDERIUS, LONERGAN & MARTIN, LLP  
500 Union Street, Suite 847  
Seattle, WA 98101  
(206)624-2800

Hon. Philip H. Brandt  
Chapter 13  
Hearing date: Thurs., 11/06/08  
at 9:00 a.m.  
Response date: 10/31/08

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN  
DISTRICT OF WASHINGTON AT SEATTLE

In re:

KAREN D. SMITH dba  
K DELORES & ASSOCIATES,  
  
Debtor.

NO. 08-13473

MOTION OF SECURED CREDITOR  
WATERMARK CREDIT UNION FOR  
RELIEF FROM AUTOMATIC STAY

COMES NOW Watermark Credit Union formerly known as Seattle Telco Credit Union by and through its attorneys, Siderius, Lonergan & Martin, LLP, and moves the court for relief from the automatic stay provisions of 11 USC § 362. Said secured creditor holds a perfected security in a 2000 BMW 740 IL automobile. Secured creditor Watermark Credit Union requests relief from the stay to allow repossession of said vehicle. Secured party also requests waiver of the provisions of BR 4001 (a)(3) so that it may forthwith commence or continue repossession through appropriate legal channels. The factual basis for this motion is set forth in the declaration of the secured creditor's representative.

DATED this 8th day of October, 2008.

/s/ Michael Siderius  
Michael Siderius, of  
SIDERIUS, LONERGAN & MARTIN, LLP  
Attorneys for Watermark Credit Union  
WSBA #25510

MOTION FOR RELIEF FROM STAY - 1

SIDERIUS LONERGAN & MARTIN LLP  
ATTORNEYS AT LAW  
500 UNION STREET  
SUITE 847  
SEATTLE, WASHINGTON 98101  
(206) 624-2800